

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

ZOHO CORPORATION,

Plaintiff,

V.

Civil Action No. 1:22-cv-37-LY

LIBERTY PEAK VENTURES, LLC,

Defendant.

LIBERTY PEAK VENTURES, LLC,

Counterclaimant,

V.

ZOHO CORPORATION,

Counter-Defendant,

and

ZOHO CORPORATION PVT. LTD.

Third-Party Defendant.

**UNOPPOSED MOTION FOR LEAVE TO SUBMIT
SUPPLEMENTAL CLAIM CONSTRUCTION BRIEFING**

Plaintiff/Counter-Defendant Zoho Corporation Pvt. Ltd. and Third-Party Defendant Zoho Corporation (collectively “Zoho”), by and through their counsel, jointly submit this motion for leave to submit supplemental claim construction briefing.

The parties have taken additional claim construction discovery, including expert depositions. In order to complete the record on claim construction issues, Zoho asks the Court for leave to submit a short supplemental brief of no more than five pages addressing the results

of that discovery. Counsel for Liberty Peak Ventures has stated that it does not oppose this motion if Liberty Peak Ventures is permitted to file a reply addressing the contents of Zoho's supplemental brief. Per the agreement of the parties, Zoho proposes the following schedule for the supplemental submissions:

March 6, 2023: Zoho files a supplemental brief addressing the claim construction discovery.

March 20, 2023: Liberty Peak Ventures files a reply to Zoho's supplemental brief.

For these reasons, Zoho requests that the Court approve the attached Order granting this Motion.

Dated: March 1, 2023

Respectfully submitted:

/s/ Phillip J. Haack

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**COUNSEL FOR ZOHOO CORPORATION
AND ZOHOO CORPORATION PVT. LTD.**

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Zoho conferred with counsel for Liberty Peak regarding the relief requested in this motion on February 28, 2023 and that counsel stated that Liberty Peak did not oppose this motion.

Dated: February 28, 2023

/s/ Phillip J. Haack
Phillip J. Haack

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

By: /s/ Phillip J. Haack
Phillip J. Haack